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UNITED STATE DISTICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO. 00-6022-CIV-LENARD

Magistrate Judge Turnoff

HENRY NARANJO and
MARLENE RAMIREZ,

Plaintiffs,

v.

STEPHEN BYRON SMITH, PALMER
JOHNSON EXPORT SALES, INC.,
PALMER JOHNSON DISTRIBUTORS,
INC., and PALMER JOHNSON, INC.

Defendants.

**MOTION FOR EXTENSION OF TIME
FOR DEFENDANT PALMER
JOHNSON, INC. TO RESPOND TO
CROSS-CLAIM OF STEPHEN BYRON
SMITH**

_____/

COMES NOW, the Defendant PALMER JOHNSON, INC., and files this its Motion for Extension of Time to Respond to Response to Cross-Claim of STEPHEN BYRON SMITH, and as grounds therefor would say as follows:

1. That on or about August 29, 2000, Defendant STEPHEN BYRON SMITH served his Cross-Claim on Defendant PALMER JOHNSON, INC.
2. That a response to said Cross-Claim is due on or before September 25, 2000.
3. That due to the undersigned counsel's recent appearance in this claim as co-counsel for Defendant PALMER JOHNSON, INC., the Defendant requires additional time to review the file and fully and accurately respond to the Cross-Claim.

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4. That this Motion is made for good cause as shown above.

5. That undersigned counsel has spoken with John D. Kallen, Esq., attorney for STEPHEN BYRON SMITH, and he has no objection to a brief extension of time to respond to the Cross-Claim up through and including October 2, 2000.

WHEREFORE, the Defendant PALMER JOHNSON, INC., respectfully request that the Court enter an Order granting this Motion and permitting them to file their reply up to and including October 2, 2000.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a true and correct copy of the foregoing was furnished by mail on the 25 day of September, 2000 to: Manuel Valdes, Esq., Rivkind & Pedraza, P.A., 66 W. Flagler St., Suite 600, Miami, FL 33130; F. David Famulari, Esq., Underwood, Karcher & Karcher, P.A., 2900 SW 28th Terrace, 6th Floor, Miami, FL 33133; and John D. Kallen, Esq., Badiak, Will & Kallen, 17071 W. Dixie Hwy., N. Miami Beach, FL 33160.

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By: 

FRANK J. SIOLI
Fla. Bar No. 9652